

SPENCER FANE BRITT & BROWNE

51739

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ROBERT E. LYONS
RICHARD H. SPENCER
DONALD W. GIFFIN **
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GAD SMITH **
EDWARD A. SETZLER
RICHARD W. SCARR **
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1400 COMMERCE BANK BUILDING
1000 WALNUT STREET
KANSAS CITY, MISSOURI 64106-2140
PHONE (816) 474-8100
TELEX 43-4345
FAX (816) 474-3216

KANSAS OFFICE
SUITE 500, 40 CORPORATE WOODS
9401 INDIAN CREEK PARKWAY
P. O. BOX 25407
OVERLAND PARK, KANSAS 66225-5407
PHONE (913) 345-8100
FAX (913) 345-0736

WASHINGTON, D. C. OFFICE
1133 CONNECTICUT AVENUE, N.W.
SUITE 1000
WASHINGTON, D. C. 20036
PHONE (202) 775-2376
FAX (202) 833-8491

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GREGORY C. LAWTON
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BRIAN N. KAYEMAN
MARTIN J. MODRIN
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PARTHENIA B. EVANS **
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ELAINE D. KOCH **
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MICHAELA M. NICOLARSEN *
CINDY SESLER BALLARD
STEPHANIE A. MATHEWS **
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MICHAEL D. HOCKLEY
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DOUGLAS J. EDMONDS **
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MARY V. RONA CLARKE **

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PEGGY F. SCHMITT
LORRI H. HILL
NANCY M. LANDS **
KEVIN J. WALDEN
MARY N. ANDERSON **
LAUR A. NEWTON **
SUSAN M. KAZAK
MARY S. SHAFER
ALICE J. FISCHER **

CHARLES S. SCHNIDER **
MITCHELL S. PETTIT *
CHARLES F. MYERS
OF COUNSEL

WRITER'S DIRECT DIAL NUMBER IS:

* ADMITTED IN KANSAS
** ADMITTED IN KANSAS AND MISSOURI
ALL OTHERS ADMITTED IN MISSOURI

PLEASE REPLY TO THE MISSOURI OFFICE
FILE NO.

April 30, 1990

Federal Express

Ms. Ruth Mancos
Emergency Support Section
U.S. Environmental Protection Agency, 5HS-11
230 South Dearborn Street
Chicago, Illinois 60604

Re: Response to Request for Information Pursuant to Section 104(e) of CERCLA and Section 3007 of RCRA, for the Conservation Chemical Company of Illinois Site in Gary, Indiana

Dear Ms. Mancos:

We are attorneys for American Telephone and Telegraph Company ("AT&T"), successor in interest to Western Electric Company, Incorporated ("Western Electric"). (See paragraph III. 8 below.)

The Environmental Protection Agency ("EPA") sent several identical letters dated January 30, 1990 addressed to Western Electric requesting information regarding Western Electric's dealings with the Conservation Chemical Company of Illinois site in Gary, Indiana ("the Gary site"). Pursuant to agreement with EPA attorney Mary Fulghum memorialized by separate letter to her this date, copy enclosed, we here respond to EPA's information requests directed to AT&T's Chicago-area Hawthorne facility ("Hawthorne facility"), [REDACTED] Ohio facility ("Columbus facility") and AT&T's Montgomery, Illinois facility ("Montgomery facility"). The affidavit of Judy McCarthy is attached hereto as Attachment I.

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By letters dated February 28, 1990 and March 15, 1990, we responded to you on behalf of AT&T's Richmond facility and Winston-Salem facility (Greensboro Shops).

I. Limitations on Scope of Inquiry and Response. Per agreement with Ms. Fulghum, this letter is subject to the following interpretations of and limitations on the requests:

A. The information requested by the January 30, 1990 letters is limited to Western Electric's dealings with the Gary, Indiana facility ("the CCCI Site" or "the site") of Conservation Chemical Company of Illinois ("CCCI") except as noted in subparagraph B(ii) below.

B. Although the information requests principally seek information about possible transportation of PCB oils to the CCCI Site, the requests cover all "hazardous substances." Ms. Fulghum, while acknowledging the primary emphasis of EPA's current inquiry to be PCBs, confirmed EPA's intention to request information at this time regarding any "hazardous substances" which might have been transported to the CCCI Site. Ms. Fulghum agreed that a company-wide search for all information regarding use, purchase, storage, treatment, disposal, transportation or other handling of any hazardous substances or materials during the period 1970 to 1985 is beyond the intended scope of the information requests. Ms. Fulghum and the undersigned, therefore, agreed to the following interpretation and modification of the information requests:

(i) [REDACTED]. Each facility addressed is required to respond only with respect to its own operations, and is not responsible for responding on behalf of any other Western Electric or AT&T facility. For purposes of this letter, the facilities addressed are the Hawthorne facility, the Columbus facility, and the Montgomery facility.

(ii) PCBs. Each facility will provide information regarding its use, purchase, storage, treatment, disposal, transportation or other handling of PCBs, without regard to whether the PCBs were transported to the CCCI site.

(iii) Other Hazardous Substances or Materials. With respect to all hazardous substances or materials other than PCBs, each facility addressed may limit its response to its use, purchase, storage, treatment, disposal, transportation or handling of hazardous substances or materials which may have been transported to the CCCI Site.

Page 3

C. Time for Response. Ms. Fulghum and the undersigned agreed that each facility addressed would have until the end of April, 1990 to respond to the information request directed to it.

D. Financial Responsibility. Ms. Fulghum agreed that, until further notice from EPA, each facility addressed may respond to the requests for information regarding financial responsibility (requests number 8 through 12) by providing a copy of AT&T's most recent annual report to shareholders.

II. Objections to Instructions. AT&T objects to the instructions which accompany the information requests to the extent that they purport to require AT&T to provide documents or information in the possession, custody or control of former employees, agents, servants, contractors or employees.

AT&T went through the largest corporate reorganization in American history commencing in 1982. The reorganization included the divestiture of 22 former wholly-owned subsidiaries, and the reorganization of Western Electric Company, Incorporated's operations and its name change to AT&T Technologies, Inc. AT&T searched records it considered likely to contain information relating to the EPA's request, and similarly has interviewed those employees it considered likely to provide such information, but cannot categorically state that it has not inadvertently overlooked some piece of information that the EPA might consider responsive to its request or that might cause AT&T to supplement, modify or correct the answers to this request. Accordingly, AT&T reserves the right to supplement, modify or correct the responses provided below. Documents that are subject to lawyer/client communications privilege, attorney work product immunity or otherwise are privileged or protected have not been produced.

III. Response to Requests. The Hawthorne facility, the Columbus facility and the Montgomery facility each respond to the information request received by it as follows:

1. Persons [REDACTED] The persons consulted in preparation of the answers to the information requests were:

For the Hawthorne Facility:

Judy McCarthy
Environmental Engineer
AT&T
One Oak Way
Berkeley Heights, New Jersey 07922
(document search only)

Page 4

For the Colu

T. M. O'Leary
Manager, Engineering Planning
AT&T Columbus Works
6200 East Broad Street
Columbus, Ohio 43213-1550

Dale E. Howell
Environmental Engineer
AT&T Columbus Works
6200 East Broad Street
Columbus, Ohio 43213-1550

Gordon Bersebach
Development Engineer, Industrial Hygiene
AT&T Columbus Works
6200 East Broad Street
Columbus, Ohio 43213-1550

Gene Bednarski
Supervisor, Maintenance
AT&T Columbus Works
6200 East Broad Street
Columbus, Ohio 43213-1550

Norm Bednarski
Supervisor, Maintenance
AT&T Columbus Works
6200 East Broad Street
Columbus, Ohio 43213

For the Montgomery Facility:

J. R. Jasien
Manager, Printed Circuit Board Engineering
& Manufacturing, Environmental Health
& Safety
AT&T Montgomery Works
Montgomery, Illinois 60538-0305

L. W. Oberc
Senior Engineer, Environmental
AT&T Montgomery Works
Montgomery, Illinois 60538-0305

Page 5

A. J. Baase
Plant Engineering Manager
AT&T Montgomery Works
Montgomery, Illinois 60538-0305

G. D. Lurz
Purchasing & Transportation Manager
AT&T Montgomery Works
Montgomery, Illinois 60538-0305

2. Documents. Documents which form the basis for each facility's response are as follows:

Hawthorne Facility. A description of the documents is attached as Attachment II. Copies of the documents themselves, marked as Exhibits H1 through H187, accompany this letter.

Columbus Facility. A description of the documents is attached as Attachment III. Copies of the documents themselves, marked as Exhibits C1 through C4, accompany this letter.

Montgomery Facility. A description of the documents is attached as Attachment IV. Copies of the documents themselves, marked as Exhibits M1 through M17, accompany this letter.

3. Other. We know of no AT&T employees, contractors or agents who may be able to provide a more detailed or complete response than contained herein. Mr. Norman Hjersted, the owner and principal officer of CCCI, may be able to provide you additional information. We have not been in contact with Mr. Hjersted and do not know his current address.

4. EPA Identification Numbers. The EPA identification numbers for each facility addressed are as follows:

Hawthorne Facility, ILD-074381427
Columbus Facility, ILD-004282703
Montgomery Facility, ILD-056625858

5. Acts or Omissions of Other Persons. AT&T objects to the broad, vague scope of this request, which does not identify the release or threat of release to which it refers, the facility or site to which it refers, the hazardous substance to which it refers, or even the company

Page 6

to which it refers. AT&T makes no response to this inquiry to the extent it may be construed to require AT&T to identify acts or omissions of third parties. AT&T is aware that a large body of evidence has been accumulated by EPA with respect to CCCI's operation of the site. AT&T refers EPA to its own files for this information.

6. Persons [REDACTED]. AT&T objects to the overbroad scope of this request. Persons identified in paragraph III.1 above and in the documents submitted herewith have knowledge or information about the generation, transportation, treatment, disposal or handling of hazardous substances or materials. It is not possible, however, for AT&T to identify "all persons" having such knowledge.

7. Handling of Hazardous Substances or Materials Which May Have Been Transported to the CCCI Site: Except as set forth below and in the exhibits hereto, none of the facilities addressed used, purchased, stored, treated, disposed, transported or otherwise handled hazardous substances or materials which may have been transported to the CCCI site during the period 1970 to 1985:

The Hawthorne facility sent a variety of waste materials to the CCCI Site, as shown in the attached documents. The Hawthorne facility's PCB records do not show any indication that the facility disposed of any PCB-containing materials at the CCCI Site.

The Columbus [REDACTED] has not been able to find any documents showing shipments of waste to the CCCI Site. AT&T's central accounting records show a single payment to CCCI by the Columbus facility in 1975 in the amount of \$500.00. Copies of the relevant accounting records are attached to my letter to Ms. Fulghum this date, copy enclosed herewith. The Columbus facility's PCB records do not show any indication that the facility disposed of any PCB-containing materials at the CCCI Site.

The Montgomery facility contracted with MacDermid Corporation for the purchase of circuit board etchants. Under the contract, MacDermid was responsible for removing used etchants. We are aware that EPA's file contains records of CCCI which show that MacDermid arranged and paid for CCCI to pick up the used etchant from the Montgomery facility during 1972 and 1973. The Montgomery facility's records, however, do not contain any documents pertaining to the CCCI Site. AT&T's central accounting records show a single payment to CCCI by the Montgomery facility in 1971 in the amount of \$1,852.50. Copies of the relevant accounting

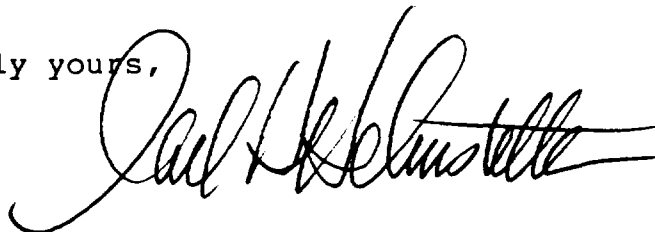
Page 7

records are attached to my letter to Ms. Fulghum this date, copy enclosed herewith. The Montgomery facility's PCB records do not show any indication that the facility disposed of any PCB-containing materials at the CCCI Site.

8-12. ~~Figure 1~~ ~~Facility~~ Western Electric Company, Incorporated, a wholly owned subsidiary of AT&T, changed its name on January 3, 1984 to AT&T Technologies, Inc. Effective December 31, 1989, AT&T Technologies, Inc. (formerly Western Electric) was merged into its parent, AT&T. As part of that merger, AT&T assumed Western Electric's liability, if any, for cleanup of hazardous substances which may have been disposed of at the CCCI Site.

Per agreement with Ms. Mary Fulghum described in paragraph I.D above, AT&T's most recent annual report to shareholders was submitted to you under cover of my letter of February 28, 1990.

Very truly yours,



CHH:nrl

cc: Ms. Mary Fulghum (without enclosures)

**DOCUMENTS CONSULTED IN PREPARATION OF
ANSWERS TO INFORMATION REQUESTS
WITH RESPECT TO THE COLUMBUS FACILITY**

EXHIBITS C1 THROUGH C4

**HVM HIGH VOLTAGE
MAINTENANCE CORP.**
5100 ENERGY DRIVE • P.O. BOX 14059 • DAYTON, OHIO 45414-0059

October 22, 1985

**A.T. & T. Technologies Inc.
6200 E. Broad Street
Columbus, Oh 43213**

ATTENTION: Mr. Howdy Wells

**SUBJECT: Engineering Report
Transformer Inspection & Oil Analysis
P.O. #J-66510 - HVM W.O. DNE-5454 & 5454-1**

Dear Mr. Wells:

Enclosed please find the engineering report, Table I, and inspection sheets N-1-85 through N-16-85, covering the transformer inspection and oil analysis of sixteen (16) transformers at your facility on July 17, 1985; and leak repair on August 25, 1985.

Our sales engineer, Mr. Bill Heffner, will be contacting you regarding the recommended repair work.

After you have had an opportunity to review this report, please let us know if you have any questions, or require additional information or service.

Sincerely,

**Mark Lautenschlager, P.E.
V.P. - Engineering & Operations**

C. Wm. Heffner

**By: C. Wm. Heffner
Sales Engineer**

**ML/lm
Encl.
cc: Mr. D.L. Adkins**

25
Celebrating Our 25 Year Anniversary
25

EXHIBIT C1

PAGE 2 (CONT'D) AT&T

Comments & Recommendations:

Note #1: Recommend installing 3/8" pipe plug in top valve in back of transformer.

Note #2: Slight PCB leak around bottom fin at inlet transformer wall, and around weld to transformer wall. Also, pin hole in weld at bottom main tank up from floor level. Top sample valve should be changed, 1/2" pipe thread 1/2" gate valve and pipe plug. Recommend leak repair be performed

Note #3: When the dielectric strength of askarel tests below 30 KV it becomes questionable. Test in six (6) months to monitor deterioration. If it is lower than 20 kV, the Askarel should be filtered.

PROJECT II: Leak Repair (HVM W.O. DWH-5454-1)

Leaks reported in note #2 were repaired with Belzona by HVM technicians on August 25, 1985.

Recommendation: Inspect and test oil in one (1) year. Inspect for PCB leaks quarterly per EPA regulations.

HVM HIGH VOLTAGE MAINTENANCE

5100 ENERGY DRIVE • P. O. BOX 1452, DAYTON, OHIO 45414

May 29, 1984

BUFFALO
716 693-6000

CINCINNATI
606.342-7710

CLEVELAND
216/951-2706

DAYTON
513.278-0811

INDIANAPOLIS
317/356-6411

MILWAUKEE
414 784-3660

A. T. & T. Network Systems
6200 E. Broad Street
Columbus, OH 43213

Attention: H. R. Wells

SUBJECT: PCB Cleanup
HVM Work Order DMN-4938

Dear Mr. Wells:

Per your request, a technician from High Voltage Maintenance Corporation inspected your transformer #4055 on May 24, 1984, and made repairs on a minor seepage of PCB at a cooling fin tube. See attached inspection report M-1-84, covering this work.

The source of the minor amount of seepage was difficult to ascertain, so the tube was cleaned and epoxied all the way around the bottom of the tube. We recommend you monitor it for awhile to assure the repair attempt was effective.

A small amount of PCB-contaminated cleanup rags was generated and removed from your facility for proper disposal at an approved PCB landfill, as covered by the attached manifest.

Please call if you have any questions or if we can be of further assistance.

Sincerely,



Thomas E. Havenar
Project Engineer

TEH/lmm
Encl.

Approved By: 
Gary M. Schaeff, E.E.
Division Manager

P.S. You need to retain this or a similar report with your records until five years after all PCB's have been removed from this facility.



CHARTER MEMBER
SPECIALIZING IN THE TESTING AND MAINTENANCE OF POWER DISTRIBUTION SYSTEMS

EXHIBIT C2



Transformer Inspection Report

Sheet No. _____ of _____

Test Report No. _____

Customer F.T.E.T. Date 5-24-84 Project No. DWN-4938
Address 6300 E. 12th St. Indianapolis, Ind. Air Temp. 65°F Rel. Humidity 40%
Owner/User SRME Date Last Inspection _____
Address _____ Last Inspection Report No. _____
Equipment Location Substation 125 360 #42
Owner Identification TRANSFORMER

NAMEPLATE INFORMATION

Manufacturer ITE KVA 500 Phase 3 Cycle 60
Serial No. 12345 Type L2-B Form _____ Class AF EA
Primary Voltage 2500 ☐ or ☐ Y ☐ Rated Current 112.2 Amperes
Secondary Voltage 2500 ☐ or ☐ Y ☐ Rated Current _____ Amperes
Coolant Oil ☐ Askarel ☒ Air ☐ Nitrogen ☐ Other ☐
Coolant Capacity 0.00 Temp. Rise 55 Impedance 5.125
No Load Tap Changer Voltages 1200 2200 3200 4200 5200

GAUGES AND COUNTERS

Oil Temp. 55 Max. Temp. 65 Reset Gauge ☒ Oil Level OK
Pressure 1/2 LRC Counter 1 Tap Setting 1

VISUAL INSPECTION

Bushings OK Connections OK Paint OK Valves OK Top ☐ Bottom ☒
Load Tap Changer OK Leaks OK Indoor ☒ Outdoor ☐ Ground ☒ Roof ☐ Pole ☐
Fans and Controls OK Gas Regulator OK Primary Bushings: Top ☐ Side ☒
Infra-Red Inspection OK Grounds OK Secondary Bushings: Top ☐ Side ☒

TEST DATA

Oil Tests: Neut. No. 1 Dielectric Strength: _____
Color 1A Cup 1 OK
IFT _____ Cup 2 OK
Average _____

Insulation Resistance: (1 Minute. Megohms) Temperature _____ Correction Factor _____

Test KV	Ins. Res. @ Test Temp.	Ins. Res. @ 20 C.
---------	------------------------	-------------------

Primary to Ground, Sec. Guarded	_____	_____
Secondary to Ground, Pri. Guarded	_____	_____
Primary to Secondary, Ground Guarded	_____	_____

Fault Gas Analysis: _____ % Combustible

Reference Other Test Sheets _____

Power Factor _____ Transformer Test _____ Turns Ratio _____ Other _____

Remarks: BACK SIDE OF XPMR, SOUTH END, THE TOP TUBE OF THE COOLING FINS SEEMS TO HAVE A VERY SLIGHT MIGRATION OFFER. CLEANED & SANDED THE AREA & APPLIED EPOXY.

Equipment Used _____

Submitted by MIKE SPUNNINGTON Sheet No. M-1-84

HAZARDOUS WASTE MANIFEST

ORIGINAL - NOT NEGOTIABLE

5/24/84
MANIFEST DOCUMENT NUMBER

HVM Corp.

NAME OF CARRIER

(SCAC)

SHIPPER NUMBER

CARRIER NUMBER

IDENTIFICATION

12 DIGIT EPA ID #	COMPANY NAME, MAILING ADDRESS, AND TELEPHONE NUMBER	DATE SHIPPED OR RECEIVED
GENERATOR SHIPPER OHD004483210	HIGH VOLTAGE MAINTENANCE CORPORATION 5100 Energy Drive Dayton, OH 45414 513-278-0811	5/24/84
TRANSPORTER #1 Not req. for PCB	AT & T Network Systems 6200 E. Broad Street, Columbus, OH 43213	5/24/84
TRANSPORTER #2 (If required)		
TSDT TREATMENT STORAGE OR DISPOSAL FACILITY OHD004483210	High Voltage Maintenance Corporation P.O. Box 14059 5100 Energy Drive Dayton, OH 45414 513-278-0811	5/24/84
TSDT TREATMENT STORAGE OR DISPOSAL FACILITY		

WASTE INFORMATION

NO. OF UNITS & CONTAINER TYPE	HM	EPA HAZ WASTE ID #	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203)	UN # OR NA #	EXEMPTION OR NO LABELS REQUIRED	FLASH POINT (°C) WHEN REQ'D	UNITS WTVOL	TOTAL QUANTITY	RATE	CHARGES (For Carrier Use Only)
			PCB Materials ORME RQ APPROX 10 LBS OF CLEAN-UP RAGS	UN2315		EST .1 KG PCB				

SPECIAL HANDLING INSTRUCTIONS

Contain any spills - do not flush

If an RQ commodity is spilled on a waterway or adjoining land, the incident must be promptly reported to the Federal government at 1-800-424-9303 (toll free) or 202-426-2675 (toll call). If other DOT Hazardous Materials are discharged creating a serious situation, call shipper's telephone number or Chemtrec 1-800-424-9300 immediately.

COMMENTS

HVM can be called 24 hours per day - (513) 278-0811

PLACARDS TENDERED

Yes ☐ No ☒

On "Collect on Delivery" shipments, the letters "COD" must appear before consignee's name or as otherwise provided in Item 430, Sec. 1

REMIT
C.O.D. TO:
ADDRESS

COD

AMT: \$

C.O.D. FEE:
PREPAID ☐
COLLECT ☐ \$

TOTAL CHARGES: \$

FREIGHT CHARGES

FREIGHT PREPAID ☐ Check box if charges are to be correct
COLLECT ☐

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding:

"If the shipment moves between two parts by a carrier by water, the law requires that the bill of lading shall state whether it is 'carrier's or shipper's weight.'"

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without receipt on the consignee, the consignee shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of Consignor)

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and classified as indicated above which said carrier (the word carrier being understood throughout this document as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or

any of, said property over all or any portion of said route to destination and as to each party of any time increased in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

CERTIFICATION

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. Environmental Protection Agency

This is to certify acceptance of the hazardous waste shipment.

TRANSPORTER #1 SIGNATURE & DATE
TRANSPORTER #2 SIGNATURE & DATE (if required)

This is to certify acceptance of the hazardous waste for treatment, storage or disposal.

GENERATOR'S SIGNATURE

DATE

TSDT SIGNATURE

DATE

Return to: DALE E. HOWELL
AT&T TECHNOLOGIES

RETURN TO

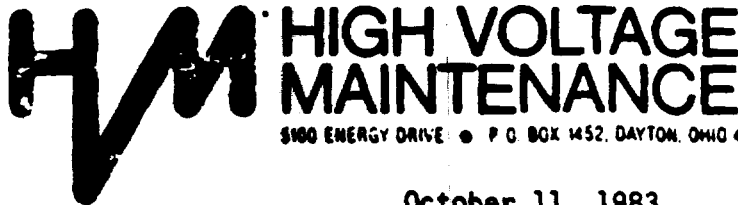
Dept. 28190
6200 E. Broad St.
Columbus, Ohio 43213 (614) 860-5143

PAGE 1

11.30.79

HAZARDOUS WASTE MANIFEST				Manifest Document Number			
IDENTIFICATION				Date Shipped or Recd.			
	I.D. Code	Name	Address				
1. Generator	OHD 004	282703	AT&T TECHNOLOGIES	6200 E. Broad St. Columbus, Ohio 43213	9-6-84		
2. Transporter	OHD-087	433744	CECOS	5092 Aber Rd Willoughby, OH 44176	9-1-84		
3. TSDP (Treatment, Storage, or Disposal Facility)	OHD-000	EN6291	CECOS	4879 Spring Grove Ave Cinn., OH 45242			
WASTE INFORMATION							
5. Shipping Description	6. Hazard Class	7. Quantity	Unit				
PCB CAPACITORS (Polychlorinated Biphenyls)	ORM-E	8 drums	55 gal				
PCB CAPACITORS (Polychlorinated Biphenyls)	ORM-E	1 Box	Box				
R.G.							
UN-2315		1299 lbs 385					
		1584 lbs Total					
EMERGENCY INFORMATION AT&T TECHNOLOGIES							
1. Immediate Response Information				Phone Number: 1-614-860-5143			
Ohio EPA Emergency Response 1-800-282-9372; National Response Center 1-800-424-8802							
2. In event of spill-contact U.S. Coast Guard 800-424-8802 for emergency assistance 426-2675							
Special Handling Instructions							
10. Comments: Product Code: DRUMS 2270-ZP Wooden Box 2270-ZC Work Order 114235							
CERTIFICATION							
This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the U.S. EPA.							
12. Dale E. Howell Generator Signature				9-6-84 Date			
This is to certify acceptance of the hazardous waste shipment.							
12. Lowell King Transporter Signature				9-6-84 Date			
This is to certify acceptance of the hazardous waste for treatment, storage, or disposal.							
12. [Signature] TSDP Signature				9/6/84 Date			

NOTE: The TSDP should return the original - for all signatures are obtained to the Generator Address Line 2 listed within



5100 ENERGY DRIVE • P.O. BOX 1452, DAYTON, OHIO 45414

October 11, 1983

BLUFFTON
716 942 6000

CINCINNATI
606 942 7100

CLEVELAND
216 991 0700

DAYTON
513 278 0800

INDIANAPOLIS
317 358 6411

MILWAUKEE
414 784 3000

Western Electric
6200 E. Broad Street
Columbus, OH 43213

Attention: Mr. Howdy Wells

SUBJECT: Transmittal of Test Data
HVM W.O. DWN-4571

Dear Mr. Wells:

Attached are test and inspection sheets M-1-83 through M-16-83, covering inspections and fluid quality tests on sixteen PCB liquid filled transformers at your 6200 E. Broad Street plant.

All fluid quality test results were good, and no PCB leaks were reported on any of the units. A number of areas were reported that deserve further investigation or corrective actions, however.

Twelve units were reported to have zero or nearly zero nitrogen pressure. We recommend these units be purged with dry nitrogen and be pressurized to +2 lbs. They then should be monitored to assure the pressure holds (to see if top gaskets are leaking).

Four units have operated near or above their thermal ratings at some time in the past. This gives a probable indication that these units have been overloaded. We recommend a load study during your peak periods, or an investigation to see if any of the load on these four can be switched to lower loaded transformers.

A number of units appear to be somewhat low on fluid. We recommend further checking of this; as too low of fluid can result in improper cooling fin operation and potential overheating.

The pressure on your 405 North transformer is reported as 6.4 lbs. Either the gauge is defective, or you have much too much pressure on this unit. It should be investigated and corrected as needed.

Lastly, your 403 transformer appears to have a slight amount of PCB residue under the drain valve. We recommend this be cleaned up properly to be on the safe side in case of an EPA inspection.

Please call if you have any questions, or if we can be of further assistance.

Sincerely,

Gary M. Schaeff, E.E.
Division Manager

EXHIBIT C4



GMS/Thy
Encl.